

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

**Civil Action No.:**  
1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendant.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Lawrence Katz, Esq., and all prior proceedings had herein, Kenneth C. Brown, The Alber Firm, P.C., formerly Law Offices of Michael J. Alber P.C., hereby moves this court before the Honorable Pamela K. Chen at the United States Courthouse, 225 Cadman Plaza East, Courtroom 4 F, Brooklyn, New York 11201, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order:

- a- Granting Defendant's counsel, Kenneth C. Brown, and The Alber Firm, P.C.'s motion to withdraw as counsel for the Defendants Safa Abdulrahim Gelardi and Vito Gelardi IME Companions LLC in this action
- b- Granting such other and further relief as the Court deems appropriate

Dated: Huntington Station, NY  
July 16, 2025

Respectfully,

*Lawrence Katz*

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Lawrence Katz, Esq.  
*Attorneys for Defendant*  
THE ALBER FIRM, P.C.  
21 Walt Whitman Road  
Huntington Station, NY 11746  
Phone: (631) 333-1600

**CERTIFICATE OF SERVICE**

This is to certify that on this 16<sup>th</sup> day of July 2025, a true and accurate copy of the Plaintiff's Notice of Motion and accompanying Affirmation, were served upon all parties via this Court's CM/ECF system. I further certify that on this 2<sup>nd</sup> day of May, 2025, a true and accurate copy of the aforesaid documents were served upon Plaintiff by E-mail.

Dated: Huntington Station, NY  
May 2, 2025

Respectfully,

*Lawrence Katz*

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Lawrence Katz, Esq.  
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